

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA)	
)	
v.)	Crim. No. 21-CR-10139-RGS
)	
NICOLE A. LESCARBEAU)	

ASSENTED TO MOTION FOR PRE-PLEA PSR

Now comes the Defendant, Nicole Lescarbeau who respectfully requests that this Honorable Court allow her and the Probation Department to complete a pre-sentence report in advance of the Rule 11 Hearing in this matter.

In support of this request, the Defendant states:

1. Ms. Lescarbeau has already completed a PSR for her prior pending federal case.
As such, this would be either a truncated interview or would not require an interview at all.
2. Completing the PSR would allow for the Court to take her guilty plea on this new matter and sentence her at the same time, with the benefit of the updated offense conduct, guideline range, and any new personal information.
3. Taking this step would allow both cases to resolve more efficiently.

Counsel has conferred with AUSA Justin O'Connell and the Probation Department who assent to this request.

Respectfully submitted,

NICOLE LESCARBEAU

By his Attorney

Respectfully submitted,

/s/ Jessica Thrall

Jessica Thrall, B.B.O.: 670412

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on May 11, 2021.

/s/ Jessica Thrall

Jessica Thrall